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8  
9 **BEFORE THE**  
10 **BOARD OF REGISTERED NURSING**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2008-192

13 **LAURIE JO BROWN**  
14 **a.k.a. LAURIE JO VANDERLEEST**  
**a.k.a. LAURIE JO HALL**  
1647 E. Clovermead Street  
15 Covina, CA 91722

**A C C U S A T I O N**

16 **Registered Nurse License No. 288239**

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18 Respondent.

19 Complainant alleges:

20 **PARTIES**

21 1. Ruth Ann Terry, M.P.H, R.N ("Complainant") brings this Accusation  
22 solely in her official capacity as the Executive Officer of the Board of Registered Nursing,  
23 Department of Consumer Affairs.

24 2. In or about 1978, the Board of Registered Nursing, Department of  
25 Consumer Affairs issued Registered Nurse License No. 288239 to Laurie Jo Brown  
26 a.k.a. Laurie Jo Vanderleest a.k.a. Laurie Jo Hall ("Respondent"). The Registered Nurse License  
27 was in full force and effect at all times relevant to the charges brought herein and will expire on  
28 February 8, 2008, unless renewed.

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3. This Accusation is brought before the Board of Registered Nursing,

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4. Section 2750 of the Business and Professions Code ("Code") provides that

5. Section 2764 of the Code provides that the expiration of a license shall not

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1 **CAUSE FOR DISCIPLINE**

2 **(Denial of Licensure by Arizona State Board of Nursing)**

3 8. Respondent has subjected her license to disciplinary action under section  
4 2761, subdivision (a)(4), on the grounds of unprofessional conduct, in that on or about May 19,  
5 2006, pursuant to an Order made by the Arizona State Board of Nursing ("Arizona RN Board"),  
6 *In the Matter of Application for RN Renewal of RN961488, Laurie Jo Brown; aka Laurie Jo*  
7 *Vander Leest, Laurie Jo Hall*, Order No. 0511114, which is attached hereto as Exhibit A, the  
8 Arizona RN Board denied Respondent's application to practice as a professional nurse in the  
9 State of Arizona.

10 **PRAYER**

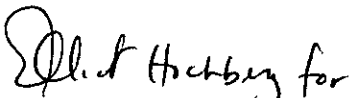
11 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
12 alleged, and that following the hearing, the Board of Registered Nursing, Department of  
13 Consumer Affairs issue a decision:

14 1. Revoking, suspending or placing on probation, Registered Nurse License  
15 No. 288239, issued to Respondent Laurie Jo Brown a.k.a. Laurie Jo VanDerLeest a.k.a. Laurie Jo  
16 Hall;

17 2. Ordering Respondent Laurie Jo Brown to pay the Board of Registered  
18 Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to  
19 Business and Professions Code section 125.3; and,

20 3. Taking such other and further action as deemed necessary and proper.

21 DATED: 12/18/07

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24 RUTH ANN TERRY, M.P.H., R.N.  
25 Executive Officer  
26 Board of Registered Nursing  
27 State of California  
28 Complainant